

REMARKS

Claims 1 and 3-8 are pending in this application. By this Amendment, claims 1 and 3-7 are amended, and new claim 8 is added. New claim 8 contains the subject matter of previously canceled claim 2. No new matter is added. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

The courtesies extended to Applicant's representative by Examiner Poon at the interviews held on March 21 and April 18, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

The Office Action rejects claims 1 and 3-7 under 35 U.S.C. §103(a) as being unpatentable over Funada (U.S. Patent No. 5,742,408) in view of Heckman (U.S. Patent No. 5,291,243). Applicants respectfully traverse this rejection.

Specifically, Applicants assert that neither Funada nor Heckman, individually or in combination, disclose or suggest an image data outputting apparatus for outputting copy forgery preventing image data for preventing copy-based forgery, including at least any one of storing, selecting, retrieving, and generating means for storing, selecting, retrieving, or generating a piece of copy forgery preventing image data corresponding to an image forming characteristic of an image forming apparatus, respectively, as recited in independent claims 1 and 3-7.

Funada discloses an image processing apparatus for adding information including the model number of the machine and/or the date of use of the machine as the pattern to be printed at certain intervals over a copy. Funada, however, fails to disclose a piece of copy forgery preventing image data corresponding to an image forming characteristic of an image forming apparatus, as recited in claims 1 and 3-7.

Heckman discloses a system for printing security documents which have copy detection or tamper resistance including color patterns with oppositely varying density patterns of electronically generated pixel dot images with varying spaces in between. Heckman, however, also fails to disclose a piece of copy forgery preventing image data corresponding to an *image forming characteristic* of an image forming apparatus, as recited in claims 1 and 3-7, and therefore, fails to make up for the deficiency of Funada.

Accordingly, neither Funada nor Heckman, individually or in combination, disclose or suggest a piece of copy forgery preventing image data corresponding to an *image forming characteristic* of an image forming apparatus, as recited in claims 1 and 3-7.

In accordance with the above remarks, Applicants submit that independent claims 1 and 3-7 define patentable subject matter. Claim 8 depends from claim 1, and therefore, also defines patentable subject matter. Thus, Applicants respectfully request that the Examiner withdraw the §103(a) rejection.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1 and 3-8 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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